

Exhibit L

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

KATHY KEIFER, Administratrix of the :
Estate of ZACHARY KEIFER, :

Plaintiff, :

vs. :

LANCASTER COUNTY, PRIME CARE :
MEDICAL, INC., JOHN W. WICKIZER, :
DENISE SIPE, MARK TURGEON, WILLIAM :
CATTELL, MATTHEW CORSIGLIA, JEFFREY :
CHRISTNER, BRIAN MCCORMICK, WILLIAM :
MORNINGSTAR and BRYAN ACHEY, :

Defendants. :

Number

5:16-cv-06620-JFL

The deposition of MARC TURGEON, M.D., was
held at the office of Marshall Dennehey, 100 Corporate
Center Drive, Suite 201, Camp Hill, Pennsylvania on
Monday, May 14, 2018 at 12:58 p.m., before DEBRA ROSE
KEENAN, Professional Court Reporter and Notary Public.

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KEENAN REPORTING SERVICE
Debra Rose Keenan
4917 Elizabethtown Road
Manheim, Pennsylvania 17545

1 Q. Where?

2 A. New Hampshire, Maryland, Delaware and
3 West Virginia.

4 Q. Have you ever practiced in another state?

5 A. Well, I do what's called telemedicine for
6 West Virginia for Prime Care. And I was doing that
7 for New Hampshire up until two weeks ago.

8 Q. All right. So what is telemedicine?

9 A. Essentially it's like Skyping. I'm
10 standing, sitting in front of a computer. And someone
11 in West Virginia -- I actually did it this morning.
12 There's a computer set up so I can see the patient.
13 They can see me. We can converse in real time. And
14 so it saves, you know, travel.

15 Q. Where is your office?

16 A. I don't have an office.

17 Q. So the telecommunications you just do
18 from your home?

19 A. Yes.

20 Q. Okay. What is your relationship with
21 Lancaster County Prison?

22 A. I go to Lancaster County Prison on
23 Tuesdays and Wednesdays.

24 Q. And that's as an employee for Prime Care?

1 A. Correct.

2 Q. How long have you been employed by Prime
3 Care?

4 A. It will be 10 years next year.

5 Q. Where did you work before that?

6 A. Lancaster Regional Hospital in Lancaster,
7 Pennsylvania.

8 Q. And what was your job there?

9 A. I was a staff psychiatrist.

10 Q. Why did you leave Lancaster General?

11 A. Lancaster Regional.

12 Q. Oh, Lancaster Regional. I'm sorry.

13 A. There was a physician who, a psychiatrist
14 who was working at Lancaster Regional who was working
15 part time at Lancaster County jail. And he was moving
16 away and asked me if I was interested in doing so,
17 working part time. This was before Prime Care had
18 gotten the contract. So I was looking at working for
19 the County of Lancaster.

20 So I spent some time with this physician.
21 Was interested. Started working there on a part-time
22 basis. And then when Prime Care came along, they
23 offered me a position.

24 Q. Okay. And who was that other physician?

1 A. I can't recall his name.

2 Q. Was it Dr. Powers?

3 A. I don't know.

4 Q. You don't know?

5 A. I don't know.

6 Q. Okay. Have you ever had any restrictions
7 on your license to practice medicine?

8 A. No.

9 Q. And did you ever have any encounters with
10 Zachary Keifer?

11 A. No.

12 Q. In your role as a psychiatrist with Prime
13 Care at Lancaster County Prison -- and I'm going to
14 take you back to December of 2014.

15 A. Okay.

16 Q. Were you still just working two days a
17 week then?

18 A. I have always worked two days a week.

19 Q. In addition to working at Lancaster
20 County Prison two days a week, were you working
21 additional hours for Prime Care?

22 A. Yes.

23 Q. And that was the teleconferencing, I
24 guess?